

MOTION NO. M2013-73
2013 Title VI Program Submittal

MEETING:	DATE:	TYPE OF ACTION:	STAFF CONTACT:	PHONE:
Board	09/26/2013	Final Action	Leslie Jones, Diversity Programs Director Alec Stephens, Diversity Technical Advisor	206-398-5047 206-398-5019

PROPOSED ACTION

Approves Sound Transit's 2013 Title VI Program for submittal to the Federal Transit Administration.

KEY FEATURES SUMMARY

- As a recipient of federal financial assistance, primarily from the Federal Transit Administration (FTA), Sound Transit must continue to ensure that it complies with Title VI of the Civil Rights Act of 1964, which protects individuals from discrimination on the basis of race, color and national origin in any program receiving federal funds.
- As a part of its Title VI obligations, Sound Transit must submit a Title VI Program for FTA approval every three years.
- The 2013 Title VI Program submittal addresses how Sound Transit complies or intends to comply with Title VI requirements and guidelines.
- Recent changes in the Title VI Guidelines issued by the FTA require that the Title VI Program be approved by the recipient's board of directors prior to submission to the FTA. The Sound Transit Title VI Program is to be submitted to the FTA on or before October 1, 2013.

BACKGROUND

Section 601 of Title VI of the Civil Rights Act of 1964 states that:

No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Sound Transit receives federal financial assistance to design and build the regional transit system through grants primarily awarded and administered by the FTA. As an FTA grant recipient, Sound Transit cannot, on the basis of race, color or national origin, either directly or through contractual means:

- Deny an individual any service, financial aid or benefit provided under the program to which he or she might otherwise be entitled;
- Make distinctions in the quality, quantity or manner in which the service or benefit is provided; or
- Segregate or separately treat individuals in any matter related to the receipt of any service or benefit.

FISCAL IMPACT

Not applicable to this action.

SMALL BUSINESS PARTICIPATION

Not applicable to this action.

EQUAL EMPLOYMENT WORKFORCE PROFILE

Not applicable to this action.

APPRENTICE UTILIZATION COMMITMENT

Not applicable to this action.

PUBLIC INVOLVEMENT

Not applicable to this action.

TIME CONSTRAINTS

The 2013 Title VI Submittal is due to the FTA on or before October 1, 2013. A delay would compromise Sound Transit's ability to comply with that deadline and risk FTA not approving the Title VI Submittal prior to the November 30, 2013 expiration of the 2010 program.

PRIOR BOARD/COMMITTEE ACTIONS

Resolution R2011-15: Adopted an inclusive public participation policy to ensure meaningful access to public involvement and community outreach programs for minority, low-income and limited English proficient populations.

Sound Transit Resolution Nos. R2013-18 and R2013-19 (pending Board Approval): Establishes policies for conducting equity analyses of Major Service Changes and Fare Changes that may impact minority and low income populations, in accordance with Title VI requirements and guidelines for Federal Transit Administration recipients.

ENVIRONMENTAL REVIEW

JI 8/28/2013

LEGAL REVIEW

RM 8/29/2013

MOTION NO. M2013-73

A motion of the Board of the Central Puget Sound Regional Transit Authority approving Sound Transit's 2013 Title VI Program for submittal to the Federal Transit Administration.

BACKGROUND:

Section 601 of Title VI of the Civil Rights Act of 1964 states that:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Sound Transit receives federal financial assistance to design and build the regional transit system through grants primarily awarded and administered by the Federal Transit Administration. As a part of its ongoing Title VI obligations, Sound Transit must continue to ensure that it complies with Title VI of the Civil Rights Act of 1964, which protects individuals from discrimination on the basis of race, color, and national origin in any program receiving federal funds.

As an FTA grant recipient, Sound Transit cannot, on the basis of race, color, or national origin, either directly or through contractual means:


- Deny an individual any service, financial aid, or benefit provided under the program to which he or she might otherwise be entitled;
- Make distinctions in the quality, quantity, or manner in which the service or benefit is provided;
- Segregate or separately treat individuals in any matter related to the receipt of any service or benefit.

Recent changes in the Title VI Guidelines issued by the FTA require the Title VI Program be approved by the recipient's board of directors...prior to submission to FTA. The 2013 Title VI Program submittal addresses how Sound Transit complies or intends to comply with Title VI requirements and guidelines containing the elements outlined in Exhibit 1. The Sound Transit Title VI Program is to be submitted to the FTA on or before October 1, 2013.


MOTION:

It is hereby moved by the Board of the Central Puget Sound Regional Transit Authority that the submittal of Sound Transit's 2013 Title VI Program to the Federal Transit Administration is approved.

APPROVED by the Board of the Central Puget Sound Regional Transit Authority at a regular meeting thereof held on September 26, 2013.


Pat McCarthy
Board Chair

ATTEST:



Marcia Walker
Board Administrator

Exhibit 1

ELEMENTS CONTAINED IN THE 2013 TITLE VI UPDATE SUBMITTAL

FTA Submittal Due Date: **October 1, 2013**

1. Copy of Board Action demonstrating that the Board has reviewed and approved the Title VI Update Submittal.

Sound Transit Motion No. M2013-73— Approving Sound Transit’s 2013 Title VI Program for submittal to the Federal Transit Administration

2. Title VI Notice to the Public, Including List of Locations Where (& How) Notices are Published

Copy of Title VI Notice to the Public, and information on where notice is posted and available to the public.

3. Title VI Complaint Procedures

- A. Copy of Instructions to the public regarding how to file a Title VI Complaint
- B. Information on where to find Sound Transit Title VI Complaint Procedures
 - ST Web
 - Sound Transit Title VI Brochure

4. Title VI Complaint Form

- A. Copy of Sound Transit Title VI Complaint Form
- B. Information on Where to Obtain Sound Transit Title VI Complaint Form
 - Imbedded as a link in Title VI Complaint Procedures on Website
 - By in person request at Sound Transit Union Station Reception or by electronic or postal mail.

5. List of Transit Related Title VI Investigations, Complaints & Lawsuits.

Table of Transit Related Title VI Complaints (No Investigations or Lawsuits)

6. Public Participation Plan, including:

- A. Information about outreach methods to engage minority and limited English proficient populations (LEP);
- B. Summary of Outreach Efforts made since the last Title VI submission
- C. Sound Transit Resolution No. R2011-15-- Inclusive Public Participation Policy

7. Language Assistance Plan for providing language assistance to LEP populations based on DOT LEP Guidance, including review of 4-Factor Analysis and update as needed.

- A. Review GIS Information to identify population changes in LEP Groups since last submittal, if any.
- B. Review Four-Factor Analysis and update Factor 2 if necessary—Frequency with which LEP persons come in contact with ST’s services and programs.
- C. Review Language Assistance Plan and document steps taken to implement the plan. Note any areas in which the plan will be revised in the future.

8. Table depicting the membership of non-elected committees and councils, the membership of which is selected by Sound Transit, broken down by race, and a description of the process ST uses to encourage the participation of minorities on those committees.

Include in Table members of:

- i. Citizens’ Oversight Panel
- ii. Diversity Oversight Committee
- iii. Citizens' Accessibility Advisory Committee

9. Description of how ST monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI submissions. [N/A—ST does not use subrecipients on the use of FTA Funds.]

10. Title VI equity analysis if ST has constructed a facility, such as vehicle storage facility, maintenance facility, operation center, parking garages etc., since October 1, 2012 issuance of FTA Circular 4702.1B.

NOTE: No decisions were made regarding such facilities since October 1, 2012 to the present.

11. Service Standards, including:

- **Vehicle Load for Each Mode**
- **Vehicle Headway for Each Mode**
- **On-Time Performance of Each Mode**
- **Service Availability for Each Mode**

12. Service Policies, including:

- **Transit Amenities for Each Mode**
- **Vehicle Assignment for Each Mode**

13. Demographic and Service Profile Maps and Charts

14. Demographic Ridership and Travel Patterns Collected by Surveys

15. Results of monitoring ridership and fare usage survey reports including evidence that the ST Board has considered, was aware of the results and approved the analysis.

16. Description of the public engagement process for setting the major service change policy, and fare change policy, including disparate impact policy, and disproportionate burden policy.

- A. Sound Transit Resolution No. R2013-18—Title VI Equity Evaluation of Major Service Changes.
- B. Sound Transit Resolution No. R2013-19—Title VI Equity Evaluation of Fare Changes.

17. Description of the service and/or fare equity analyses conducted since the last Title VI Program Submission, including evidence that the ST Board was aware of, and approved the results of the analysis.

Exhibit 2

CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY

“SOUND TRANSIT”

TITLE VI PROGRAM

Submitted

to the

Federal Transit Administration - Region X

of the

U.S. Department of Transportation

(October 2013)

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Section I. INTRODUCTION

Section 601 of Title VI of the Civil Rights Act of 1964 states that:

No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Transit Administration (FTA) is responsible for ensuring that federally supported transit services and related benefits are distributed by applicants and recipients of FTA assistance in a manner consistent with Title VI, and has published guidelines for transit agencies to examine current services and practices for compliance.

The Central Puget Sound Regional Transit Authority (“Sound Transit”) submits this Title VI Program Update in compliance with the requirements set forth in FTA Title VI Circular C 4702.1B (FTA Circular).¹

Section II. GENERAL REQUIREMENTS FOR ALL RECIPIENTS

1. Board Action demonstrating that the Board has reviewed and approved the Title VI Update Submittal.

Sound Transit Motion No. M2013-73, was passed by the Sound Transit Board of Directors on September 26, 2013, approving Sound Transit’s 2013 Title VI Program for submittal to the Federal Transit Administration. A copy of the Board Staff Report and Motion No. M2013-73 is included in the Appendix to this program submittal as Appendix A.

2. Title VI Notice to the Public, Including List of Locations Where (& How) Notices are Published

A. A Title VI Notice is included on the Sound Transit Website under the heading of Contact Us, and may be accessed at the following website link:

<http://www.soundtransit.org/Contact-Us>

B. Sound Transit includes a Title VI notice in the “Ride the Wave Transit Guide”, under the heading, ‘Fair and equal treatment (non-discrimination)’ for all members of the public who wish to use the systems and access schedules. The Transit Guide is published 3 times a year, and is available at Sound Transit’s Union Station headquarters, on ST Express buses and Sounder commuter rail trains, and is

¹ FTA Circular C 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients.” October 1, 2012.

distributed throughout the region at and may also be accessed at the following website link:

http://www.soundtransit.org/Documents/pdf/rider_guide/transit_guide/RTW_Sept13_EntireBook_9-11-13.pdf

- C. Sound Transit also has a Title VI Brochure, which is at the reception desk at Sound Transit's Union Station headquarters and is also distributed at outreach events.
- D. Title VI and non-discrimination provisions are included in Sound Transit's contract provisions as appropriate.

Samples of the Title VI Notices are included in this program submittal as Appendix B.

3. Title VI Complaint Procedures

A. A current copy of Sound Transit's Title VI Complaint Procedures is included this program submittal as Appendix C. The Procedures are included in the Title VI Notice on the Sound Transit website under the heading of Contact Us, and may be accessed at the following website link: <http://www.soundtransit.org/Contact-Us>. In addition, the Complaint Form is imbedded in the procedures also as a link for immediate access.

B. The complaint procedures are also outlined in Sound Transit's Title VI Brochure, which is included as a sample in Appendix B.

4. Title VI Complaint Form

A current copy of Sound Transit's Title VI Complaint Form is included this program submittal as Appendix D. The Form is imbedded in the Title VI Complaint Procedures as a part of the link following the discussion of Sound Transit's Title VI Notice on the Sound Transit website under the heading of Contact Us, and may be accessed at the following website link: <http://www.soundtransit.org/Contact-Us>.

In addition, the Complaint Form is available for people who come to Sound Transit's headquarters offices' reception area, and can also be mailed to people interested in obtaining the form and procedures, but do not have access to receiving electronic copies.

5. List of Transit Related Title VI Investigations, Complaints & Lawsuits.

A list of transit-related Title VI Complaints (and the disposition of those complaints) from December 2010 through September 16, 2013, has been provided in a table included

in this program submittal as Appendix E. During this period, there were no transit-related investigations or lawsuits.

6. Public Participation Plan.

In December 2011, Sound Transit adopted Resolution R2011-15-- Inclusive Public Participation Policy, to assure meaningful access to public involvement and community outreach programs for minority, low-income and limited English proficient populations. The policy formally incorporated practices and strategies that have been in use and continued development since Sound Transit's initial program to build the regional transit system. An overview of those practices and strategies for inclusive public participation is included in the Appendix to this Program.

Key features of the policy are to ensure that Sound Transit's public involvement and community outreach programs are designed to meet the following goals, pursuant to Title VI of the Civil Rights Act of 1964:

- Providing services without regard to race, color, or national origin;
- Promoting the full and fair participation of affected populations in transit decision making;
- Preventing denial, reduction, or delay in benefits related to programs and activities that benefit minority or low-income populations; and
- Facilitating meaningful access to programs and activities by persons with limited English proficiency.

The policy applies to planning and service aspects of Sound Transit projects. The policy re-affirms Sound Transit's commitment that it will continue to include low-income, minority and limited English groups in its public involvement and community outreach programs, including service changes, fare changes and future service planning.

As set forth in the policy, Sound Transit's public involvement and community outreach programs will continue to be designed to engage diverse populations by:

- Meeting environmental justice requirements and limited English proficiency needs.
- Making materials available in multiple formats, holding meetings in accessible facilities and providing meeting and project information to underserved populations.
- Providing the public with innovative opportunities and methods for accessing agency and project information.
- Engaging diverse populations early in the planning and development process.
- Making information available to minority, low-income, and limited English proficient populations.

A copy of the Board Staff Report and Resolution R2011-15, the Overview of Sound Transit's Inclusive Public Participation Program, and a comprehensive summary table of

the outreach efforts to engage minority, low income and limited English proficient populations from 2010 to the present (and planned for the remainder of 2013) are included in this program submittal as Appendix F.

7. Language Assistance Plan.

The following are key elements in Sound Transit's plan and actions for providing language assistance to persons with limited English proficiency based on the DOT LEP Guidance:

- A. Prepared a Four Factor Analysis and Language Implementation Plan from which it was determined that the primary non-English language group throughout the region was Spanish.
- B. The following elements have been prepared and implemented as a result for Spanish Language Speakers—
 - Spanish Language information in the Ticket Vending Machines. [Note: Chinese (Mandarin) is also provided as it is the 2nd largest non-English language group.]
 - Spanish on the Sound Transit public website for basic information for riding the system at <http://www.soundtransit.org/Spanish>
 - Spanish language rider information in the “Ride the Wave Transit Guide: http://www.soundtransit.org/Documents/pdf/rider_guide/transit_guide/RTW_Jun13_Entire%20book_print.pdf (starts on page 38 of the document), with printed copies available at Sound Transit's Union Station headquarters, at locations throughout the region, or on Sound Transit buses or trains.
 - Video information is also provided on the Sound Transit public website for using the ORCA fare card is located at <http://www.soundtransit.org/Fares-and-Passes/ORCA-card>.
- C. If space is limited, a language information block is provided for obtaining information in Spanish and Chinese (Mandarin) [Note: Chinese is the 2nd largest non-English language group]. Where space is available, such as on the Transit Guide, additional language blocks are included for Korean, Russian, Tagalog (major language in the Philippines) and Vietnamese.
- D. Sound Transit has Over-the-phone interpreter services for anyone calling in for information. This service is available for 150 languages and connects the caller with Sound Transit customer service personnel.
- E. Recognizing that some persons within the LEP populations may not be able to read or write in their own languages, Sound Transit Link stations have used pictograms to identify stations along the route and is working on increasing the use of international symbol signage for all riders, regardless of their language barriers.

F. In planning projects, especially during planning activities for design and construction, or service and fare changes, an assessment is made regarding LEP-impacted populations and efforts are made to provide various communications strategies to reach LEP populations. This may include written materials and notices, providing interpreters at public meetings, or accessing interpreter services in the field, especially during construction.

A copy of Sound Transit's Four Factor Analysis and updated Language Implementation Plan are included in this program submittal as Appendix G.

8. Table depicting the membership of non-elected committees and councils, selected by Sound Transit, broken down by race, and a description of the process ST uses to encourage the participation of minorities on those committees.

The Table depicting minority representation on Sound Transit appointed committees is included in this program submittal as Appendix H. This table shows the minority representation on Sound Transit's Citizens Accessibility Advisory Committee, Citizens Oversight Panel, and Diversity Oversight Committee. A key consideration for all of these committees is representation spread across the three counties (King, Pierce and Snohomish) that comprise the Sound Transit District and also the 5 subareas (Pierce & Snohomish Counties, and East, North & South King Counties).

The recruitment processes for each of these committees are as follows:

Citizens Accessibility Advisory Committee (CAAC): A major role of the CAAC is to identify factors inhibiting regional mobility, prioritize issues and work to enhance transportation services for individuals who are disabled or elderly. Recruitment is focused on senior and disabled communities, two-thirds of whom must be 2 members from the 5 subareas, and up to 5 at-large members. Current membership is 12, with gender balance, 1 African American, 7 Persons with Disabilities, and 4 Seniors.

Citizens Oversight Panel (COP): The COP is represented by at least 2 members from each of the 5 subareas. The recruitment process seeks to follow Board direction to: 1) Establish a process to incorporate input from Boardmembers within the subarea where recruitment is taking place, and 2) provide a process that is inclusive and allows for a diverse COP. Vacancies on the panel are advertised to a wide audience by posting on the Sound Transit website, sending a news release to media outlets, including community newspapers serving diverse populations and blogs and forums. The web posting and news release includes a statement that persons of color and women are encouraged to apply. Sound Transit Staff will also inform all Sound Transit Boardmembers and Sound Transit Diversity Oversight Committee members, along with jurisdictions within the subarea with a vacancy.

Diversity Oversight Committee (DOC): The DOC is composed of members from throughout the Sound Transit District, and includes representatives from small business, trade and craft organizations, communities and community organizations in impacted neighborhoods, and other such interested parties as deemed appropriate by the CEO. Committee members are independent of Sound Transit, meaning they have no contracts with Sound Transit and no plan to compete for bid on Sound Transit contracts or subcontracts. The committee reflects the cultural and ethnic diversity of the communities in the Sound Transit District. Recruitment is especially made to the small and minority business, labor and community organizations that engage with Sound Transit's Diversity Programs office on issues regarding employment and contracting on the Sound Transit project.

In all instances minorities are encouraged to participate on these committees, and as Sound Transit moves forward, it is our intent to establish ties with the State Commissions for African American Affairs, Asian Pacific American Affairs, Hispanic Affairs, and Indian Affairs and expand sources to help recruitment efforts.

9. Description of how Sound Transit monitors its subrecipients for compliance with Title VI and a schedule of subrecipient Title VI submissions.

ST does not have subrecipients receiving FTA Funds.

10. Title VI equity analysis if ST has constructed a facility, such as vehicle storage facility, maintenance facility, operation center, parking garages etc., since October 1, 2012 issuance of FTA Circular 4702.1B.

Sound Transit has not constructed a facility at this point since the initial segment for light rail, however, it made siting decisions prior to the issuance of the FTA Circular 4702.1B. We will conduct such equity analyses for decisions that are to be made and construction to be completed between this submittal and the anticipated program submittal in 2016.

Section III. REQUIREMENTS FOR ALL FIXED ROUTE TRANSIT PROVIDERS

11. Service Standards and Policies, including:

- **Vehicle Load for Each Mode**
- **Vehicle Headway for Each Mode**
- **On-Time Performance of Each Mode**
- **Service Availability for Each Mode**

The system-wide service standards for each fixed route mode are described in the *Sound Transit Service Standards and Performance Measures- 2010 Edition*, which is included in this program submittal as Appendix I. A copy of the Sound Transit Board Documents adopting the policies are also included in Appendix I. The *Service Standards and*

Performance Measures-2010 Edition include measures and performance targets for vehicle passenger loads, headways, on-time performance and service availability.

12. Service Policies, including:

- **Transit Amenities for Each Mode**
- **Vehicle Assignment for Each Mode**

Transit Amenities for Each Mode

Criteria for passenger amenities at on-street bus stops is described in the *Sound Transit Service Standards and Performance Measures- 2010 Edition* which is included in Appendix I. Criteria for passenger amenities at off-street bus facilities and Sounder stations is described in the *Design Standards and Guidelines for Sounder and ST Express Passenger Facilities*. Criteria for passenger amenities at Link light rail stations is described in the *Link Design Criteria Manual*.

Vehicle Assignments

Bus vehicle assignments and train assignments are based on passenger demand, with larger buses and longer trains assigned as needed to meet passenger load standards. Vehicle assignments are also driven by the vehicle maintenance capabilities of Sound Transit's bus operating contractors.

Link Light Rail and Sounder Commuter Rail

For Link Light Rail (Tacoma Link and Central Link) and Sounder Commuter Rail, the system-wide service is uniform as there is no distinction in equipment being used for those modes of transit from one end of the fixed routes to the other.

ST Express Bus

Sound Transit contracts with other transit agencies within its 3-county region to operate and maintain its fleet. Vehicle assignment of ST Express Bus operations is based on a combination of ridership estimates and the type of equipment that can be maintained at the various bus bases. Sound Transit has a fleet of 281 buses. A few of the oldest buses (6) were delivered in 1999 and a few of the newest buses (5) were delivered in 2013. Most of the buses in the fleet (263 or 94%) were delivered between 2001 and 2012. As vehicles are replaced, they are retired from service for Sound Transit. A copy of the Fleet Summary is included in this program submittal in Appendix J.

SECTION IV. REQUIREMENTS FOR ALL 50+ PEAK SERVICE FIXED ROUTE PROVIDERS IN URBANIZED AREAS WITH A POPULATION OF 200,000+ PEOPLE

13. Demographic and Service Profile Maps and Charts

Demographic and Service Profile Maps and Charts updated in July 2013 are included in this program submittal in Appendix K.

14. Demographic Ridership and Travel Patterns Collected by Surveys

Sound Transit intends to develop and implement a method to collect ridership and travel pattern surveys by race in the future. It will seek assistance from FTA as it goes forward in this area.

15. Results of monitoring ridership and fare usage survey reports including evidence that the ST Board has considered, was aware of the results and approved the analysis.

Prior to the issuance of the FTA Circular Sound Transit had developed a system to monitor transit service comparing customer satisfaction surveys with quality of service analysis focusing on the ST Express bus service network. That survey was submitted to FTA in April 2011. The performance measures included service availability, on-time performance, customer complaints and preventable accident rates. The analysis did not find any significant performance disparities between routes serving higher-than-average Title VI populations and the ST Express system as a whole. Thus, no corrective actions were taken as a result of the analysis.

Sound Transit is in the process of performing a similar survey, but will see guidance from the FTA regarding its relevancy under the FTA Circular. To facilitate that discussion, a copy of the previous survey is included in this program submittal in Appendix L.

16. Description of the public engagement process for setting the major service change policy, and fare change policy, including disparate impact policy, and disproportionate burden policy.

On September 26, 2013, the Sound Transit Board will consider adoption of Resolution No. R2013-18: Establishing policies for conducting equity analyses of Major Service Changes impacting minority and low income populations; and Resolution No. R2013-19: Establishing policies for conducting equity analyses of Fare Changes impacting minority and low income populations.

On August 5th, over 60 organizations and individuals in the Sound Transit region representing minority and low income advocacy, interest and community based organizations, were sent a letter notifying recipients of the proposed policies and soliciting comments. The letter included a summary of the proposed actions along with copies of the draft resolutions, and offering to provide further information or respond to questions regarding the draft policies. The information also contained a discussion of Title VI, and the process for public comment not only to staff, but also the dates and times in which the Executive Committee and the Sound Transit Board meeting would take place to take action on the resolutions should they decide to provide comments directly to Boardmembers. A second communication was sent on August 19. In addition, this information was provided to Sound Transit's Diversity Oversight Committee for discussion and comments at their meeting, held on August 23, 2013.

As a result of the request for comments Sound Transit has been contacted jointly by four organizations with suggestions on how the policies should be implemented and proposed a revision to the fare change resolution to specifically include “changes in payment type, payment media, and availability or duration of paper or electronic transfers”. Sound Transit has incorporated that revision into the resolution and will follow-up with the organizations on other issues as the policies are implemented.

A copy of the joint Board Staff Report for Resolutions R2013-18 and R2013-19 and the Resolutions are included in Appendix M.

17. Description of the service and/or fare equity analyses conducted since the last Title VI Program Submission, including evidence that the ST Board was aware of, and approved the results of the analysis.

The following fare changes and service changes were conducted since the last Title VI Program Submission.

Fare Changes:

- FFY 2012— Begin collecting regular Sound Transit Express bus fares at all times of day for trips taken within the current downtown Seattle Ride Free Area upon the elimination of the Ride Free Area on September 29, 2012. Title VI Fare Equity Analysis performed.
- FFY 2013—Establishing fares to be collected on Tacoma link light rail and the elimination of free ride fares for Tacoma Link light rail. Draft Title VI Fare Equity analysis has been completed and outreach to affected Title VI populations

underway. Fares are anticipated to go in effect in FFY 2014. In Progress for Board action in September 2013.

Service Changes

- FFY 2011—A Title VI analysis was conducted on the following service changes that took place during FFY 2011: ST Express changes include reducing unproductive service on Routes 510, 513, 535, 540, 554 and 560, deleting Route 599, and deferring service improvements previously approved in the 2010 SIP on Routes 513, 554 and 566. ST Express service improvements on Routes 511, 522 and 532 were recommended for implementation in February 2011 as previously approved in the 2010 SIP. Recommended changes for Tacoma Link adjust service levels as a result of a proposed new station at 11th and Commerce in downtown Tacoma.
- FFY 2012—A Title VI analysis was conducted on the following service changes that took place during FFY 2012: Sounder commuter rail extended to South Tacoma and Lakewood; Downtown Tacoma-Puyallup segment of bus Route 578 deleted; Sunday/holiday service added on bus Route 578; Downtown Tacoma-Tacoma Dome segment of bus Route 586 deleted; bus Route 593 deleted and trips converted to Route 590 service; downtown Seattle segment of Route 592 revised.
- FFY 2013—A Title VI analysis was conducted on the following service changes that took place or are planned for FFY 2013: One additional round trip added on Sounder commuter rail between Seattle and Lakewood; West Seattle-White Center segment of bus Route 560 deleted; service levels reduced on bus Route 566; implementation of new bus Route 567 express service between Kent and Bellevue/Overlake; consolidation of off-peak bus service on ST Express Routes 510 and 511; Downtown Everett-Everett Station segment of bus Route 510 deleted; peak period service added on Routes 510 and 513.

For all of the Fare and Service Changes a Title VI Analysis was performed and where negative impacts were assessed disproportionately regarding minority or low-income populations, mitigation measures were taken. For the Fare Changes in FFY 2012 & 2013, Sound Transit Board was apprised of the results of the Title VI evaluation in the Board Staff Report. For the major service changes, as of the Service Implementation Plan (SIP) conducted for 2012 and 2013 (adopted in 2011 and 2012), the Title VI Analysis was also made a part of the executive summary to call attention to the evaluation and has also been added as a feature in the Board Staff Report beginning with 2013 SIP (adopted in 2012).

In the latest fare change that came to the Board in September 2013, establishing fares to be collected on Tacoma link light rail and the elimination of free ride fares for Tacoma

Link light rail, the Title VI analysis was conducted using the frame work for the policies also proposed to the Board for its September meeting. Relevant portions of the fare and service changes are included in this program submittal in Appendix N.

Exhibit 3

Draft 2013 Title VI Program

Detailed List of Appendices:

A. Board Staff Report and Motion No. M2013-73, approving Sound Transit’s 2013 Title VI Program for submittal to the Federal Transit Administration (9-26-13).

B. Samples of Sound Transit’s Title VI Notices.

- On Sound Transit Website
- In Sound Transit “Ride the Wave” Transit Guide
- Sound Transit Title VI Brochure
- In Sound Transit Contract Provisions

C. Sound Transit Title VI Complaint Procedures

- On the Sound Transit Website
- In the Sound Transit Title VI Brochure (see Appendix B)

D. Sound Transit Title VI Complaint Form

E. List of Transit-Related Title VI Complaints

[NOTE: There were no transit-related Title VI investigations or lawsuits during the period of this report—December 2010 through September 16, 2013.]

F. Public Participation Plan

- Board Staff Report and *Resolution R2011-15-- Inclusive Public Participation Policy*
- Overview of Sound Transit’s Inclusive Public Participation Program
- Summary of Outreach Efforts to Engage Minority, Low Income and Limited English Proficient Populations (2010 thru 2013)

G. Language Assistance Plan

- Sound Transit Four Factor Analysis
- Sound Transit Language Implementation Plan (Updated)

H. Minority Representation on Sound Transit Committees

I. Service Standards

- **Sound Transit Board Staff Report and Motion No. M2010-63--Updating Sound Transit Service Standards**
- **Sound Transit Service Standards and Performance Measures- 2010 Edition**

J. Service Policies

- **Transit Amenities for Each Mode**
- **Vehicle Assignment for Each Mode**
- **Fleet Summary**

K. Demographic and Service Profile Maps and Charts

L. Transit Service Monitoring

- **2011 Quality of Service Analysis**

M. Policies for Title VI Evaluation of Service and Fare Changes

- **Board Staff Report for Resolutions R2013-18 and R2013-19**
- **Resolution R2013-18—Title VI Equity Evaluation of Major Service Changes**
- **Resolution R2013-19—Title VI Equity Evaluation of Fare Changes**

N. Equity Analyses of Fare & Service Changes Since 2010 Submittal

- **Downtown Seattle Fare Change**
- **Tacoma Link Light Rail Fare Change**
- **2011 Service Implementation Plan**
- **2012 Service Implementation Plan**
- **2013 Service Implementation Plan**